

1 BILAL A. ESSAYLI
Acting United States Attorney
2 JOSEPH T. MCNALLY
Assistant United States Attorney
3 Acting Chief, Criminal Division
JONATHAN GALATZAN
4 Assistant United States Attorney
Chief, Asset Forfeiture & Recovery Section
5 JAMES E. DOCHTERMAN (Cal. Bar No. 256396)
Assistant United States Attorney
6 Asset Forfeiture & Recovery Section
1100 United States Courthouse
7 312 North Spring Street
Los Angeles, California 90012
8 Telephone: (213) 894-2686
Facsimile: (213) 894-6269
9 E-mail: James.Dochterman@usdoj.gov

10 Attorneys for Plaintiff
UNITED STATES OF AMERICA

11 UNITED STATES DISTRICT COURT
12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,
14 Plaintiff,
15 v.
16 VIRTUAL CURRENCY AND
17 \$2,061,517.68 IN U.S. CURRENCY,
18 Defendants.

Case Number 2:25-cv-04631-SB-MAR

STIPULATION TO EXTEND TIME TO
RESPOND TO INITIAL SERVED
COMPLAINT BY NOT MORE THAN 30
DAYS

[Civil Local Rule 8-3]

Complaint Served: August 13 ,2025

Current Claim Due Date: Sept. 17, 2025

Current Answer Due Date: Oct. 8, 2025

New Claim Due Date: Oct. 17, 2025

New Answer Due Date: Nov. 7, 2025

24
25 Pursuant to Civil Local Rule 8-3, plaintiff United States of America and potential
26 claimant Credit Control Corporation (“Potential Claimant”) hereby stipulate and agree to
27 extend the time for Potential Claimant to respond to the initial complaint served in this
28 action. The complaint was served August 13, 2025. Potential Claimant’s time to file a

claim to contest the forfeiture of the defendants is September 17, 2025, and an answer to the complaint is due twenty-one (21) days thereafter (*i.e.*, October 8, 2025). *See* Suppl. Rule G(4)(b)(ii) of the Federal Rules of Civil Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions. The parties have agreed to a thirty-day extension of these deadlines. Accordingly, potential claimant's time to file a claim to the defendants is extended to October 17, 2025, and an answer or other responding document to the complaint is extended to November 7, 2025.

Dated: September 17, 2025

Respectfully submitted,

BILAL A. ESSAYLI
Acting United States Attorney
JOSEPH T. MCNALLY
Assistant United States Attorney
Acting Chief, Criminal Division
JONATHAN GALATZAN
Assistant United States Attorney
Chief, Asset Forfeiture & Recovery Section

/s/ James E. Dochterman

JAMES E. DOCHTERMAN
Assistant United States Attorney
Asset Forfeiture & Recovery Section

Attorneys for Plaintiff
UNITED STATES OF AMERICA

DATED: September 17, 2025

/s/ with permission

JILL H. FERTAL
Cipriani & Werner PC

Attorney for Potential Claimant
CREDIT CONTROL CORPORATION

PROOF OF SERVICE BY E-MAIL

I am a citizen of the United States and a resident of or employed in Los Angeles County, California; my business address is the Office of United States Attorney, 312 North Spring Street, 11th Floor, Los Angeles, California 90012; I am over the age of 18; and I am not a party to the above-titled action;

On September 17, 2025, I served a copy of: **STIPULATION TO EXTEND THE TIME TO RESPOND TO INTIAL SERVED COMPLAINT BY NOT MORE THAN 30 DAYS** on each person or entity named below by transmitting the document by electronic mail to the e-mail address indicated for receipt of e-mail on the date and place shown below following our ordinary office practices. Each person has given consent to receive service by e-mail.

TO: JILL H. FERTEL
Cipriani & Werner PC
450 Sentry Parkway Suite 200
Blue Bell, PA 19422
jferter@c-wlaw.com

I am readily familiar with the practice of this office for transmittal of electronic mail from a desktop computer which allows for confirmation that an e-mail message was sent on a particular day and time. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on September 17, 2025, at Los Angeles, California.

Paul J. Read
PAUL J. READ
Paralegal, FSA